

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

FILED
U.S. DISTRICT COURT
DISTRICT OF NEBRASKA

2019 NOV 12 PM 4:02

OFFICE OF THE CLERK

UNITED STATES OF AMERICA,

Plaintiff,

vs.

TITUS J. MILLER,

Defendant.

SEALED

4:19CR3126

INDICTMENT

18 U.S.C. § 2251(a)

18 U.S.C. § 2252A(a)(2)

The Grand Jury charges that

COUNT I

Beginning on or about August 20, 2019 and continuing until on or about October 15, 2019 within the District of Nebraska, TITUS J. MILLER, the defendant herein, did employ, use, persuade, induce, entice, and coerce a minor, Victim 1, to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported using any means and facility of interstate and foreign commerce; and using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Sections 2251(a).

COUNT II

Beginning on or about August 24, 2019 and continuing until on or about September 12, 2019 within the District of Nebraska, TITUS J. MILLER, the defendant herein, did employ, use, persuade, induce, entice, and coerce a minor, Victim 2, to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported using any means and facility of interstate

and foreign commerce; and using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Sections 2251(a).

COUNT III

Beginning on or about August 17, 2019 and continuing until on or about September 5, 2019, within the District of Nebraska, TITUS J. MILLER, the defendant herein, did employ, use, persuade, induce, entice, and coerce a minor, Victim 3, to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported using any means and facility of interstate and foreign commerce; and using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Sections 2251(a).

COUNT IV

On or about September 11, 2019, within the District of Nebraska, TITUS J. MILLER, the defendant herein, did employ, use, persuade, induce, entice, and coerce a minor, Victim 4, to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported using any means and facility of interstate and foreign commerce; and using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Sections 2251(a).

COUNT V

On or about September 16, 2019, within the District of Nebraska, TITUS J. MILLER, the defendant herein, did employ, use, persuade, induce, entice, and coerce a minor, Victim 5, to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported using any means and facility of interstate and foreign commerce; and using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Sections 2251(a).

COUNT VI

On or about October 15, 2019, in the District of Nebraska, the defendant, TITUS J. MILLER, the defendant herein, did knowingly distribute visual depictions of child pornography, that is, digital and computer images in files that had been mailed, shipped and transported in interstate and foreign commerce by any means, including by computer, the production of such visual depictions having involved the use of a minor engaging in sexually explicit conduct and were depictions of such conduct.

In violation of Title 18, United States Code, Section 2252A(a)(2).

COUNT VII

On or about October 22, 2019, in the District of Nebraska, the defendant, TITUS J. MILLER, the defendant herein, did knowingly distribute visual depictions of child pornography, that is, digital and computer images in files that had been mailed, shipped and transported in interstate and foreign commerce by any means, including by computer, the production of such visual

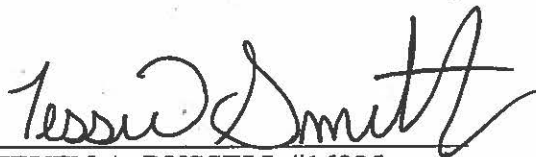
depictions having involved the use of a minor engaging in sexually explicit conduct and were depictions of such conduct.

In violation of Title 18, United States Code, Section 2252A(a)(2).

A TRUE BILL.

FOREPERSON

The United States of America requests that trial of this case be held in Lincoln, Nebraska, pursuant to the rules of this Court.

A handwritten signature in black ink, appearing to read "Steven A. Russell", written over a horizontal line.

STEVEN A. RUSSELL #16925
Assistant U.S. Attorney